

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

-----X
PRIME 4 VENTURES, INC.

Plaintiff,

-against-

CREATIVE CONCEPTS OF AMERICA, INC.
and RED BULL OF NORTH AMERICA, INC.

Defendants.
-----X

Civil Action No.

07 CV 6912-(LAK)-(MHD)

**NOTICE OF
CROSS-MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Affidavit of Eugene F. Haber, sworn to on September 25, 2007, and the exhibits attached thereto, and the Memorandum of Law of Plaintiff Prime 4 Ventures, Inc. in Support of its Cross-Motion and in Opposition to Defendant Red Bull of North America, Inc.'s Motion to Dismiss the Complaint, dated September 25, 2007, Plaintiff Prime 4 Ventures, Inc., through its undersigned counsel, will move this Court before the Honorable Lewis A. Kaplan at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York on such date as may be determined by the Court, for an Order, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, to amend the Complaint, with leave of the Court.

Dated: Garden City, New York
September 25, 2007

COBERT, HABER & HABER

By: 

Eugene F. Haber [EH5021]
1050 Franklin Avenue, Suite 507
Garden City, NY 11530
(516) 248-7844

Attorneys for Plaintiff Prime 4 Ventures, Inc.

To: Sonnenschein Nath & Rosenthal, LLP
Christine Lepera, Esq.
Attorneys for Defendant
RED BULL OF NORTH AMERICA, INC.
1221 Avenue of the Americas
New York, NY 10020-1089
(212) 768-6700

CREATIVE CONCEPTS OF AMERICA, INC.
Defendants *pro se*
4300 N. University Drive, A-106
Ft. Lauderdale, FL 33351

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AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
COUNTY OF NASSAU)^{ss.}

ANGELA CORSO, being duly sworn, deposes and says:

Deponent is not a party to the action, is over the age of 18, and resides at Garden City, New York.

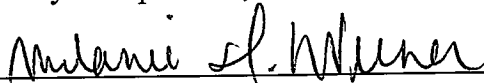
On **September 25, 2007** deponent served a copy of the within **NOTICE OF CROSS-MOTION, AFFIDAVIT OF EUGENE F. HABER, AND MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S CROSS-MOTION AND IN OPPOSITION TO DEFENDANT'S MOTION TO DISMISS** by depositing same, securely enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the United States Postal Service within New York State, addressed to each of the following persons at the last known address set forth after each name:

Sonnenschein Nath & Rosenthal, LLP
Attorneys for Defendant
RED BULL OF NORTH AMERICA, INC.
1221 Avenue of the Americas
New York, NY 10020-1089
(212) 768-6700

CREATIVE CONCEPTS OF AMERICA, INC.
Defendants *pro se*
4300 N. University Drive, A-106
Ft. Lauderdale, FL 33351


ANGELA CORSO

Sworn to before me this
25th day of September, 2007


Notary Public

MELANIE I. WIENER
Notary Public, State of New York
No. 01WI6165791
Qualified in Nassau County
Commission Expires May 14, 2011

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NOTICE OF CROSS MOTION

COBERT, HABER & HABER
Attorneys for Plaintiff
1050 Franklin Avenue, Suite 507
Garden City, NY 11530
(516) 248-7844

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed document(s) are not frivolous.

Dated: Garden City, N.Y.
September 25, 2007

Service of a copy of the within

is hereby admitted.

Dated: Garden City, N.Y.
September 25, 2007

Attorney(s) for

PLEASE TAKE NOTICE:

NOTICE OF ENTRY

That the within is a (certified) true copy of a entered in the office of the Clerk of the within-named Court on

NOTICE OF SETTLEMENT

That an Order of which the within is a true copy will be presented for settlement to the Hon. one of the judges of the within-named Court on

Dated: Garden City, N.Y.
September 25, 2007

COBERT, HABER & HABER
Attorneys for Plaintiff
1050 Franklin Avenue - Suite 507
Garden City, NY 11530

To:
Attorney(s) for